Dear Commissioner,

Europe currently has an extensive gas network comprising of 2.2 million kilometres of pipelines. This network allows gas to flow easily from the point of production to the final customer, as well as across Member States’ borders. European legislation is in place, which when properly enacted will ensure the efficient functioning of the internal energy market in natural gas.

In recent years there has been an increase in the amount of renewable gas produced in Europe. Biomethane is gas that has been produced from renewable sources and is upgraded so that it meets the requirements of the gas grid, and thus it can be injected into the gas network. Injection into the gas grid can be done only when the quality specifications are met and biomethane does not compromise the security of the grid or the security of the end-consumer.

There is a vast potential for the development of biomethane inside the EU and in neighbouring countries. To ensure the ‘sustainable’ property of this biomethane an international certification scheme should be set up to allow this gas to access the European market and contribute to achieving the European energy and climate goals while at the same time optimally using the existing infrastructure. Several Member States have established registry bodies to verify and track the use of biomethane within their jurisdiction. These bodies are responsible for verifying the sustainability of biomethane production and tracking (with the help of local market actors) its injection and withdrawal on different points in the gas network. This allows customers to use gas that has been certified as renewable. However, there is currently no means for customers to have the opportunity to purchase this renewable gas, if it is not produced within their own Member State.
We support the establishment of a European system that allows biomethane certificates to be valid throughout the EU, if the biomethane is both produced and injected into the gas network in the EU. The normal balancing mechanisms already in place in the gas network, ensure that gas injected into the grid is only counted once. We are aware that similar mechanisms are currently in place for other fuels, such as biodiesel and bioethanol.

We, therefore, welcome the European Biogas Association’s initiative to prepare a detailed proposal on this issue for your consideration.

Yours sincerely,

Gert De Block
Secretary General
CEDEC

Jan Ingwersen
General Manager
ENTSOG

Beate Raabe
Secretary General
Eurogas

Carmen Gimeno
Secretary General
GEODE

Thierry Deschuyteneer
Executive Secretary
GIE

Cc:
Mr Maroš Šefčovič, Vice-President for Energy Union
Mr Pierre Schellekens, Deputy Head of Cabinet
Mr Yvon Slingenberg, Senior Advisor
Mr Peter Van Kemseke, Cabinet Expert
Ms Marie Donnelly, Director, DG ENER
Ms Paula Abreu Marques, Head of Unit Renewables, DG ENER
Mr Bernd Kúpker, Officer, DG ENER
Ms Ruta Baltause, Officer, DG ENER
Mr Giulio Volpi, Officer, DG ENER
Mr Andreas Pilzecker, Officer, DG CLIM
Dr. Jan Štambaský, President, European Biogas Association